From: Akhter Hossain
To: "Stuart Klaus"

Cc: "SMITH, MARTIN L"; Michael Stephenson; Brady Gerber; Mostafa Kamal; Jump, Christine; STEWART, LON R

Subject: RE: CH-Wichita, Bldge. B,D, process area and Tanks

Date: Wednesday, September 03, 2014 2:58:00 PM

Stuart,

I am looking forward to receiving the revised certification cover letter and modified tables for the Bldg. D submittal.

Once I receive the hard copy, I will review it and make sure that you addressed everything we discussed today. If it meets our requirements, I will send the email approval based on your **Certified document.**

Thank you

Akhter

From: Stuart Klaus [mailto:sklaus@geostatenvironmental.com]

Sent: Wednesday, September 03, 2014 12:08 PM

To: Akhter Hossain

Cc: 'SMITH, MARTIN L'; Michael Stephenson; Brady Gerber **Subject:** RE: CH-Wichita, Bldge. B,D, process area and Tanks

Akhter,

Per our recent conversation, I will be revising my certification cover letter and modifying attached tables for the Bldg D submittal.

Revisions will include:

- 1. The Bld D cover letter will add that a discussion that the Boiler Room and Maintenance Rooms within Bldg D were not permitted for and were never known to have been used for storage of waste materials. Therefore the Boiler and Maintenance rooms were not washed/rinsed/sampled.
- 2. The spreadsheet tables for Bldg D Room sampling results, specifically the "Bld D Resample Table" tab will be modified to include footnotes that will identify the second (on 2/19) and third resampling (on 2/24) of Room 2. Specifically it will be noted that the third resampling (PCB's only) was due to breakage of the PCB sample containers during shipment of the second samples to the laboratory.
- 3. A short discussion will be provided on bis(2-Ethylhexyl)phthalate (DEHP). Information will discuss DEHP as a very common ubiquitous chemical, how DEHP is the most common of the class of phthalates which are used as plasticizers, accounting for an almost 54% market share in 2010. Due to its suitable properties and the low cost, DEHP is widely used as a plasticizer in manufacturing of articles made of PVC. Plastics may contain 1% to 40% of DEHP. It is also used as a hydraulic fluid and as a dielectric fluid in capacitors. DEHP also finds use as a solvent in glowsticks. Approximately three billion kilograms are produced annually worldwide.[2] It is estimated that at least 241 million pounds of dioctyl phthalates were produced in the US in 1999, so DEHP is a High Production Volume Chemical. The most

probable route of exposure to DEHP is through food, with an average contribution of DEHP from food of 0.25 milligrams per day (mg/d). DEHP migrates into food from plastics during processing and storage. DEHP is common in plastics used in medical procedures and laboratories, and as such is a common lab contaminant. Sources: Wikipedia On-line Article 9/3/14 "Bis(2-ethylhexyl) phthalate"; USEPA Technology Transfer Network - Air Toxics Web Site, Bis(2-ethylhexyl) phthalate (DEHP) 117-81-7.

4. A short discussion / rewording of the section that discusses on-site backfill will be modified to specifically exclude the on-site disposal of materials other than broken concrete pieces and broken concrete blocks originating in the Bld B building walls or ceilings.

The revised certification cover letter and only the revised table will be sent back to you, first by an email with attachments, then as a printed hard copy following via FedEx. As you are aware we preparing to move forward with scheduling of the demolition activities, as such your prompt attention and response to these submittals is appreciated.

Thanks Stuart Klaus

From: Akhter Hossain [mailto:ahossain@kdheks.gov]

Sent: Tuesday, September 2, 2014 4:38 PM

To: STEWART, LON R

Cc: 'SMITH, MARTIN L'; Michael Stephenson; Stuart Klaus; Mostafa Kamal; 'Jump, Christine'

Subject: CH-Wichita, Bldge. B,D, process area and Tanks

Mr. Lon Stewart, P.E

KDHE received your letter of August 22, 2014 on August 28, 2014 regarding Bldg. J. KDHE also received the revised certification of Bldg. B rinsate sample results, Bldg. D and Rafter Tank rinsate sample results on August 26, 2014 from your consultant. In addition KDHE also received Process area and process area tanks rinsate sample results on August 28, 2014 from your consultant. **Based on the certified results, KDHE has the following short email**. Detailed letter will be sent later.

Bldg B: Revised certified rinse sample results looks good. Facility can use the above grade materials as broken backfill at the site.

KDHE didn't review the shallow soil sample results since the samples were uncertified and is submitted as part of RFI; Not as part of closure.

In case the facility decide to use the concrete flooring as a backfill, facility will be required to get approval from EPA Region 7.

It is understood that at the time of the final facility closure, samples will be collected from the entire facility and analyzed as per the approved closure plan.

Process area and process area tank: certified rinse sample results looks good. Facility can use the above grade building materials including Building canopy and the large tanks for common metals re-cycling.

KDHE didn't review the shallow soil sample results since the samples were uncertified and is submitted as part of RFI; Not as part of closure.

Consultant's letter of Aug. 26, 2014 stated that "Process areas concrete flooring will be removed and segregated for disposal as hazardous waste during demolition of the building".

In case the facility decide to use the concrete flooring as a backfill, facility will be required to get approval from EPA Region 7.

It is understood that at the time of the final facility closure, samples will be collected from the entire facility and analyzed as per the approved closure plan

Bldg. D: KDHE is reviewing the Bldg. D results and will send comments. KDHE also had short conversation with the certifying Engineer.

Thank you

Akhter Hossain; P.E KDHE/BWM